

1 GAYLE A. KERN, ESQ.  
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2 KAREN M. AYARBE, ESQ.  
Nevada Bar No. 3358  
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7 *Attorneys for Defendant*  
8 *Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 USROF III LEGAL TITLE TRUST 2015-1,  
BY U.S. BANK NATIONAL ASSOCIATION,  
12 AS LEGAL TITLE TRUSTEE,

13 Plaintiff,

14 v.

15 TBD, LLC, a Nevada Limited-Liability  
16 Company; TBR I, LLC, a Nevada Limited-  
17 Liability Company; AIRMOTIVE  
18 INVESTMENTS, LLC, a Nevada Limited-  
Liability Company; HIGHLAND RANCH  
19 HOMEOWNERS ASSOCIATION, a Nevada  
Non-Profit Corporation; KERN &  
20 ASSOCIATES, LTD., a Nevada Corporation,

21 Defendants.  
22 \_\_\_\_\_/

Case No.: 2:17-cv-02083-RFB-PAL

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR GAYLE A.  
KERN, LTD. DBA KERN &  
ASSOCIATES, LTD. TO ANSWER OR  
OTHERWISE RESPOND TO  
COMPLAINT**

[Third Request]

23 ***IT IS HEREBY STIPULATED*** between Plaintiff, USROF III Legal Title Trust 2015-1,  
24 by U.S. Bank National Association, as Legal Title Trustee (“Plaintiff”), by and through its counsel,  
25 Wright, Finlay & Zak, LLP, and Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.  
26 (“Kern”), by and through its counsel Kern & Associates, Ltd., to extend the deadline for Kern to  
27 answer or otherwise respond to Plaintiff’s Complaint up-to-and-including October 27, 2017.  
28

1 Pursuant to a prior Stipulation and Order, the current deadline for Kern to file its answer  
2 or otherwise respond to the Complaint is September 22, 2017.

3 Plaintiff and Kern (collectively referred to as the "Parties") stipulate and agree to an  
4 additional, extension of the deadline for Kern's answer or other response to the Complaint up-to-  
5 and-including October 27, 2017. The Parties continue progress in substantive discussions with  
6 regard to the claims and defenses in this matter, and wish to conserve the time and resources of  
7 the Parties and the Court while such discussions move forward. Therefore, good cause exists for  
8 the extension. This is the third request for an extension of time with respect to this matter and is  
9 not intended to cause delay or prejudice to any party.  
10  
11

12 DATED this 6<sup>th</sup> day of October, 2017.

DATED this 6<sup>th</sup> day of October, 2017.

13 ***KERN & ASSOCIATES, LTD.***

***WRIGHT, FINLAY & ZAK, LLP***

14 /s/ Karen M. Ayarbe, Esq.

/s/ Paterno C. Jurani, Esq.

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21 *Attorneys for Defendant Gayle A. Kern,*  
22 *Ltd. dba Kern & Associates, Ltd.*

*Attorneys for Plaintiff USROF III Legal Title*  
*Trust 2015-1, by U.S. Bank National*  
*Association, as Legal Title Trustee*

23 **ORDER**

24 ***IT IS SO ORDERED.***

25 DATED this 12th day of October, 2017.

26   
27 UNITED STATES MAGISTRATE JUDGE

28 ***Respectfully Submitted By:***

/s/ Karen M. Ayarbe, Esq.

KAREN M. AYARBE, ESQ.

*Attorneys for Defendant Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.*

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/s/ Christine A. Lamia  
An Employee of Kern & Associates, Ltd.